



December 21, 2020

Docket Operations, M-30  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Room W12-140, West Building Ground Floor  
Washington, DC 20590-0001

Re: Comments of the Association for Unmanned Vehicle Systems International (AUVSI) in response to the Federal Aviation Administration's (FAA) request for comment on the notice of policy for Docket No. FAA-2020-1086, Airworthiness Criteria: Special Class Airworthiness Criteria for the Amazon Logistics, Inc. MK27.

To Whom It May Concern:

AUVSI is pleased to offer comments in support of the proposed airworthiness criteria for Amazon Logistics, Inc. MK27 unmanned aircraft system (UAS).

As the world's largest non-profit organization devoted exclusively to advancing the unmanned systems and robotics community, AUVSI has witnessed firsthand the massive growth and technological advancements of the drone industry. Thousands of businesses – large and small, across the country – are embracing this technology to enhance efficiency, keep people safe and provide intelligence beyond what was previously possible.

AUVSI was pleased that the FAA recognized under the amended 14 CFR Part 21, the issuance of type certificates for special classes of aircraft. AUVSI supports the FAA's desire to pursue criteria that is performance based, with standards specific to UAS that are unique, novel, and with features that the special category was designed to accommodate. The development of airworthiness criteria is a critical step forward for the UAS industry, allowing for enhanced operations such as Beyond Visual Line of Sight (BVLOS) and operations at night. The FAA process also ensures a high-degree of confidence in the safety of the aircraft, which is important for public acceptance.

AUVSI believes with the MK27, Amazon Logistics, Inc. have sought to meet the required high-level of safety, and urges the FAA to proceed with a final standard that is performance based and proportional to the size and scale of the Amazon aircraft.

Drone delivery of commercial goods is a possibility that has captured the imagination of the public and has the potential to transform our delivery economy in exciting and innovative ways. AUVSI strongly supports the Special Class Airworthiness Criteria for the Amazon Logistics, Inc. MK27. This is a meaningful step in the right direction towards the safe and commonplace integration of UAS.

Thank you,

Brian P. Wynne  
President and CEO